

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

650 FRONTIER, LLC,)	Case No.: 6:14-CV-00206
)	
Plaintiff)	NOTICE OF REMOVAL OF
)	ACTION UNDER 28 U.S.C.
v.)	§1441(b) (DIVERSITY)
)	
SENG C. LIN; LEMEI LIN; PAINE C.)	
BOUNE; and CLARA BOUNE,)	
)	
Defendants.)	

TO THE CLERK OF THE ABOVE ENTITLED COURT:

PLEASE TAKE NOTICE that defendants, SENG C. LIN; LEMEI LIN; PAINE C. BOUNE; and CLARA BOUNE (collectively, “Defendants”) hereby remove to this Court the state court action described below.

1. On May 1, 2014, Plaintiff 650 Frontier, LLC (“Plaintiff”) commenced an action in the 146th Judicial District of Bell County, State of Texas, , entitled 650 FRONTIER, LLC, Plaintiff v. SENG C. LIN, LIMEI LIN, PAINE C. BOUN, and CLARA BOUN, Defendants (collectively, “Defendants”), bearing Case Number 270,233-B (the “Action”). A true and correct copy of the complaint in the Action (the “Complaint”) is attached hereto as **EXHIBIT A** and is incorporated herein by this reference.

2. Defendants received copies of the Complaint on May 9, 2014 and May 10, 2014, respectively, when they were each personally served with summons thereof.

3. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1332, and is one which may be removed by Defendants pursuant to the provisions of 28 U.S.C. §1441(b) in that it is a civil action between citizens of different states and the matter in

controversy exceeds the sum of \$75,000, exclusive of interest and costs, as expressly alleged in the subject Complaint (see **EXHIBIT A**). Specifically, ¶41 of the Complaint provides the following allegations:

“41. The following amounts were due and owing under the Loan Documents as of January 5, 2014, excluding fees and costs incurred by Lender in connection with attempting to collect the amounts due under the Loan Documents:

<i>Principal:</i>	<i>\$2,693,142.08</i>
<i>Nondefault Interest:</i>	<i>\$89,709.90</i>
<i>Default Interest:</i>	<i>\$36,030.86</i>
<i>Late Charges:</i>	<i>\$2,505.17</i>
<i>Total:</i>	<i>\$2,821,388.01</i>

4. Complete diversity of citizenship exists in that: Plaintiff, as alleged in the Complaint at ¶2, is a limited liability company organized under the laws of the State of Delaware; Defendants, and each of them, are individuals residing, and served, in the State of California [see Complaint ¶¶3-6].

5. Accordingly, the Court has original jurisdiction pursuant to 28 U.S.C. § 1332(a). This action is removable to this District and Division pursuant to 28 U.S.C. § 1441(a) and 28 U.S.C. § 1446(b).

6. All Defendants herein consent to this removal, as reflected by the signature of their counsel of record below. 28 U.S.C. § 1446(a).

7. As required under 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being filed with the 146th Judicial District Court of Bell County, Texas. Furthermore, as required under 28 U.S.C. § 1446(d), Defendants are serving Plaintiff with a copy of this Notice of Removal.

8. WHEREFORE, Defendants hereby remove the above-captioned action from the 146th Judicial District Court of Bell County, Texas to this United States District Court.

Dated: June 2, 2014

Respectfully submitted,

/s/ Eric C. Wood

Eric C. Wood
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ADMISSION TO BE REQUESTED)

ATTORNEYS FOR DEFENDANTS
SENG C. LIN, LEMEI LIN,
PAINE C. BOUNE and CLARA BOUNE

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2014, I served a true and correct copy of the foregoing pleading upon the following counsel of record pursuant to the Federal Rules of Civil Procedure:

James Billingsley
Caitlin J. Morgan
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***Via First Class Mail
& Facsimile (214) 397-0033***

/s/ Eric C. Wood
Eric C. Wood